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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.

Case No. 08-35653-KRH
Chapter 11
Jointly Administered

**RESPONSE AND OPPOSITION BY JUBILEE-SPRINGDALE, LLC TO
LIQUIDATING TRUST'S THIRD OMNIBUS OBJECTION TO LANDLORD
CLAIMS SEEKING TO AMEND CLAIM 8282**

Jubilee-Springdale, LLC ("Jubilee"), by counsel, in response to the *Liquidating Trust's Third Omnibus Objection to Landlord Claims* (the "Objection"), does hereby oppose and respond, as set forth below:

1. Circuit City Stores, Inc. and certain of its affiliated entities (collectively, "Debtors") filed a petition for relief on or about November 10, 2008 ("Petition Date"). After the Petition Date, Debtors continued to be in possession of and to operate their business.
2. A review of the Objection shows the Debtors' attempt to amend and reduce Claim 8282 filed by Wells Fargo Bank as Trustee for the Registered Holders of JP Morgan Chase Commercial Mortgage Securities Corp. Commercial Mortgage which appears to concern the debts owed by the Debtors to Jubilee.

3. On or about May 1, 2009, Jubilee filed a proof of claim, number 12771 (the "Jubilee Claim"), amending claim number 9248 and setting forth a general unsecured claim in the amount of \$759,541.86 representing sums due under the Debtor's lease with Jubilee and rejection damages due under that lease.

4. Jubilee objects to the extent that the Objection to Claim 8282 seeks to alter the Jubilee Claim or any claim based upon the Debtor's obligations to Jubilee.

WHEREFORE, Jubilee respectfully requests that this Court deny the relief requested in the Objection as it relates to the Jubilee Claim in its entirety; require Debtors to amend their erroneous classification of the claim; and such other and further relief as is just and proper.

Dated: Richmond, Virginia
April 7, 2011

Respectfully submitted,

/s/ Kimberly A. Pierro

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 7, 2011, a true and exact copy of the foregoing was served via ECF notification to the following:

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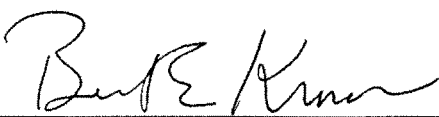
/s/ Kimberly A. Pierro
Counsel

DECLARATION

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that to the best of my knowledge the foregoing is true and correct.

Dated: April 7, 2011

JUBILEE-SPRINGDALE, LLC

By: 
Name: Benton E. Kraner
Title: Senior Vice President of its
Managing Member